

**ORIGINAL**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of  
  
Numbering Resource Optimization

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**COMMENTS OF BELL SOUTH**

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## EXECUTIVE SUMMARY

On March 17, 2000, the Commission achieved a major milestone when it adopted national rules and policies to promote the efficient use of numbering resources in its *Numbering Resource Optimization Order* (“*NRO Order*”). In that order, the Commission, among other things, established reporting requirements for all carriers, adopted a utilization threshold framework for non-pooling carriers, and mandated the implementation of thousands-block number pooling. The Commission seeks to build upon the foundation laid in the *NRO Order* through its *Further Notice of Proposed Rulemaking* (“*FNPRM*”), which requests comment on four subjects: (1) the utilization threshold for non-pooling carriers; (2) the timing of pooling implementation for carriers not currently capable of providing local number portability; (3) paying for numbering resources; and (4) the costs associated with number pooling. BellSouth addresses each of these issues below.

*Utilization Threshold for Non-Pooling Carriers.* As an initial matter, BellSouth believes that the enhanced enforcement authority granted to the NANPA, the semi-annual forecasting and utilization reporting requirement, and the Month-To-Exhaust procedures set forth in the Central Office Code (NXX) Assignment Guidelines significantly reduce the need for a utilization threshold. Nonetheless, if the Commission proceeds with the adoption of a utilization requirement for non-pooling carriers, the Commission should set the initial threshold at 50 percent with annual increases no greater than five percent until it reaches a maximum of 70 percent. If the Commission later determines that the threshold or the annual increase is too low, it can re-visit the issue and modify the requirements accordingly.

BellSouth also believes that the Commission's new utilization framework must have additional safeguards to ensure timely access to numbering resources. Specifically, BellSouth urges the Commission to: (1) prescribe a single national utilization threshold based on rate centers rather than permitting states to adopt their own thresholds; and (2) ensure that non-pooling carriers with low utilization are not precluded from obtaining growth codes when there is a *bona fide* business need.

*Transition Period for Commercial Mobile Radio Service ("CMRS") Carriers.*

The Commission should grant CMRS carriers a transition period of twelve months after the implementation of wireless number portability to commence pooling. Granting a transition period would: (1) allow CMRS carriers flexibility to deal with the technical challenges associated with number pooling; (2) help ensure continued progress on other regulatory compliance efforts (*e.g.*, E911, number portability, CALEA ("Communications Assistance for Law Enforcement Act")); and (3) maintain network and service reliability.

*Paying For Numbering Resources.* The record is virtually unanimous – the Commission should not require carriers to pay for numbering resources. There are strong legal, policy, and administrative reasons against such a payment mechanism. Thus, rather than expending resources to devise and evaluate a pricing mechanism for numbers, the Commission should allow the new conservation measures adopted in the *NRO Order* time to work.

*Cost Recovery.* Although BellSouth is unable at this time to provide detailed cost information, a preliminary assessment reveals that the modifications to BellSouth's networks and operations support systems will be substantial. To assist the Commission,

BellSouth has identified the various types of costs that it is likely to incur to implement pooling.

In the absence of detailed cost data, BellSouth nevertheless urges the Commission to proceed with developing a cost recovery mechanism. The Commission established a cost recovery scheme for number portability prior to having detailed cost information, and there is no reason why it cannot take the same approach here. Moreover, as with cost recovery for number portability, the Commission should permit, but not require, incumbent LECs subject to rate-of-return or price-cap regulation to recover their carrier-specific costs directly related to providing number pooling through an optional federal charge assessed on end-users.

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**COMMENTS OF BELL SOUTH**

BellSouth Corporation, by counsel and on behalf of itself and its affiliated companies ("BellSouth"),<sup>1</sup> respectfully submits these comments on the *Further Notice of Proposed Rulemaking* ("FNPRM") adopted in the above-captioned proceeding.<sup>2</sup>

**I. INTRODUCTION**

The Commission ushered in a new era of number administration and conservation on March 17, 2000, when it adopted national rules and policies to promote the efficient use of numbering resources. This new framework is the culmination of years of hard work, effort, and communication by and among members of the FCC, the state commissions, industry fora, and various segments of the telecommunications industry. BellSouth commends the Commission for taking a leadership role and recognizing the need for uniform national standards in the effort to optimize numbering resources. As the Commission appropriately concluded, the "rapid depletion of numbering resources

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<sup>1</sup> BellSouth Corporation is a publicly traded Georgia corporation that holds the stock of companies that offer local telephone service, provide advertising and publishing services, market and maintain stand-alone and fully integrated communications systems, and provide mobile communications and other network services world-wide.

<sup>2</sup> *Numbering Resource Optimization*, CC Docket No. 99-200, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 00-104 (rel. Mar. 31, 2000) ("*NRO Order*" and "*FNPRM*").



nationwide and the potential it creates for NANP [“North American Numbering Plan”] exhaust are *national* problems that must be dealt with at the *federal* level.”<sup>3</sup> While there is still much to be done to implement the various measures and rules adopted in the *Numbering Resource Optimization Order* (“*NRO Order*”), this new framework is a major step in the right direction.

The instant *FNPRM* seeks to build upon the foundation laid in the *NRO Order*. Specifically, the *FNPRM* requests comment on four subjects: (1) the utilization threshold for non-pooling carriers;<sup>4</sup> (2) the timing of pooling implementation for carriers not currently capable of providing local number portability;<sup>5</sup> (3) paying for numbering resources;<sup>6</sup> and (4) the costs associated with number pooling.<sup>7</sup> BellSouth addresses each of these issues more fully herein.

**II. IN THE ABSENCE OF ACTUAL DATA REGARDING CARRIER UTILIZATION, THE COMMISSION SHOULD SET THE INITIAL UTILIZATION THRESHOLD AT FIFTY PERCENT WITH ANNUAL INCREASES NO GREATER THAN FIVE PERCENT.**

In the *NRO Order*, the Commission adopted “a minimum utilization threshold that non-pooling carriers must satisfy before obtaining additional numbering resources.”<sup>8</sup> The Commission deemed this utilization requirement to be “an equitable way to make sure that carrier requests are needs-based.”<sup>9</sup> Although this nationwide utilization threshold is

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<sup>3</sup> *NRO Order*, ¶ 3 (emphasis added).

<sup>4</sup> *FNPRM*, ¶ 248.

<sup>5</sup> *Id.*, ¶ 249.

<sup>6</sup> *Id.*, ¶ 251.

<sup>7</sup> *Id.*, ¶ 253.

<sup>8</sup> *NRO Order*, ¶ 103.

<sup>9</sup> *Id.*, ¶ 115.

scheduled to become effective January 1, 2001, the Commission has yet to determine the appropriate threshold level.<sup>10</sup> The Commission proposes to set the initial threshold at 50 percent with annual increases of 10 percent until it reaches 80 percent.<sup>11</sup>

As an initial matter, BellSouth believes that the need for a utilization threshold has been significantly reduced in light of the enhanced enforcement authority granted to the North American Numbering Plan Administrator (“NANPA”). The *NRO Order* directs the NANPA to withhold numbering resources from any U.S. carrier that fails to comply with the Commission’s new reporting requirements and verification standards.<sup>12</sup> BellSouth submits that the enhanced enforcement mechanisms combined with the Months-To-Exhaust procedures defined in the Central Office Code (NXX) Assignment Guidelines are sufficient to manage a carrier’s utilization.

BellSouth cautions the Commission against relying on the utilization thresholds previously suggested by commenters as a benchmark for establishing a new nationwide threshold.<sup>13</sup> These prior estimates were developed before the Commission adopted the new utilization formula in the *NRO Order*.<sup>14</sup> Indeed, as the Commission correctly recognized, “most of the suggested utilization thresholds included in the numerator were based on additional categories besides *assigned numbers*.”<sup>15</sup> While the Commission’s new formula includes only “Assigned” numbers in the numerator, previous commenters

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<sup>10</sup> *NRO Order*, ¶ 115.

<sup>11</sup> *FNPRM*, ¶ 248.

<sup>12</sup> *NRO Order*, ¶ 84.

<sup>13</sup> *See NRO Order*, ¶ 115.

<sup>14</sup> The Commission’s formula for calculating utilization is to divide all assigned numbers (numerator) by the total numbering resources assigned to that carrier in the appropriate geographic region (denominator) and multiplying the result by 100. *NRO Order*, ¶ 109.

<sup>15</sup> *NRO Order*, ¶ 115.

included other number categories in the numerator (*e.g.*, aging, reserved, administrative).<sup>16</sup> Consequently, it would be inappropriate to base a utilization threshold on the previously suggested figures, since those percentages are overstated under the new formula.

While the most effective way to establish a utilization threshold is to consider actual data, BellSouth recognizes that the existing record lacks such data. Consequently, in the absence of actual carrier utilization data, the Commission should set the initial threshold at 50 percent. Given that the new formula for utilization includes only "Assigned" numbers, a 50 percent initial threshold is reasonable and should enable carriers to obtain sufficient numbering resources in a timely manner.

BellSouth also urges the Commission to adopt a reasonable annual increase. As discussed above, the best approach would be to evaluate data before establishing the annual rate. However, in the absence of such data, the Commission should limit the annual adjustment to five percent. The ten percent increase suggested in the *FNPRM* is simply too aggressive at this time, given the absence of data to support such an increase.

Finally, BellSouth recommends that the threshold increase annually until it reaches a maximum of 70 percent.<sup>17</sup> A threshold level greater than 70 percent, as proposed by the Commission, could potentially result in non-pooling carriers running out of numbers. This result cannot be what the Commission intended. If the Commission

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<sup>16</sup> BellSouth believes that the Commission's new utilization formula is flawed because it significantly overstates the numbers available for assignment. BellSouth intends to address this issue more fully in an upcoming Petition for Reconsideration.

<sup>17</sup> Unless the Commission modifies its new utilization formula to include categories other than "Assigned" numbers, it is likely that even a 70 percent threshold may be too high, thereby jeopardizing carriers' ability to obtain numbers in a timely fashion.

later determines that the five percent annual increase or the threshold is too low, it can re-visit the issue and modify the requirements.

Establishing an annual increase or threshold that is too high would result in the unnecessary denial of code requests. As a result, the NANPA, state commissions, and carriers would be forced to expend significant time and resources trying to resolve these denials to ensure access to codes. Such delays would thwart competition, especially for new entrants with smaller subscriber bases and numbering resources, since carriers with rapidly growing markets would not be able to obtain numbering resources in a timely manner. Accordingly, if the Commission decides to adopt a utilization requirement for non-pooling carriers at this time, it should set the initial threshold at 50 percent with annual increases of five percent up to a maximum of 70 percent.

**III. THE FRAMEWORK FOR THE PROPOSED UTILIZATION THRESHOLD REQUIREMENT MUST INCLUDE ADDITIONAL SAFEGUARDS TO ENSURE SUFFICIENT ACCESS TO NUMBERING RESOURCES.**

In the event the Commission proceeds with the adoption of a nationwide utilization threshold for non-pooling carriers, BellSouth proposes additional guidelines to complement the requirements adopted in the *NRO Order*. In that order, the Commission set forth the following framework for applying the utilization threshold requirement:

- *Exemption of Pooling Carriers.* Carriers participating in pooling are exempt from complying with the utilization threshold requirement.<sup>18</sup>

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<sup>18</sup> *NRO Order*, ¶ 103 (“We exempt pooling carriers from this additional utilization threshold requirement in recognition of their requirement to donate to the pool uncontaminated and lightly contaminated thousands-blocks that are not needed to maintain short-term inventory levels.”).

- *Applies to Requests for Growth Codes Only.* The utilization threshold applies when a carrier is seeking to obtain growth codes, not initial codes.<sup>19</sup>
- *Calculation of Utilization at the Time a Code Is Requested.* Non-pooling carriers seeking growth codes should calculate utilization at the time the growth code is requested.<sup>20</sup>
- *Based on Wireline Rate Centers.* Carriers must calculate utilization based on wireline rate centers.<sup>21</sup>
- *Time for Grant/Denial of Code Request.* The NANPA must grant or deny a request for a growth code within ten business days from receipt of the request.<sup>22</sup>

BellSouth endorses the Commission's adoption of the above requirements and believes they are necessary to minimize any adverse effects on non-pooling carriers seeking additional numbering resources. Nevertheless, additional safeguards are necessary to protect carriers while simultaneously promoting the goal of efficient number use. Accordingly, BellSouth suggests that the Commission adopt the proposals described below.

**A. The Commission Should Allow Non-Pooling Carriers With Low Utilization To Still Obtain Growth Codes If There Is A *Bona Fide* Need.**

It is imperative that any utilization requirement adopted by the Commission incorporate some flexibility. There will inevitably be instances when a non-pooling carrier cannot meet the utilization threshold, but nonetheless has a legitimate need for

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<sup>19</sup> See *NRO Order*, ¶ 115 (“We are convinced that requiring carriers not participating in pooling to meet a utilization threshold before they receive a growth code is an equitable way to make sure that carrier requests are needs-based.”).

<sup>20</sup> See *NRO Order*, ¶ 104.

<sup>21</sup> *NRO Order*, ¶ 105 (“We require rate center-based utilization to be reported because it more accurately reflects how numbering resources are assigned.”).

<sup>22</sup> To be codified at 47 C.F.R. § 52.15(g)(3)(iv).

numbers in a rate center. For example, plans to expand existing geographic service areas or offer service promotions should constitute legitimate needs that warrant granting a request for additional codes despite less-than-required utilization. Under these circumstances, a carrier should not be precluded from obtaining numbering resources simply because it has not met the utilization threshold. BellSouth therefore proposes that the Commission establish a process whereby a non-pooling carrier can make a *bona fide* showing to obtain a growth code even if it has not met the utilization threshold. Carriers must be afforded an opportunity to demonstrate legitimate needs to the NANPA by providing supporting documentation.

**B. The Commission Should Not Allow Individual States To Establish Utilization Thresholds.**

BellSouth urges the Commission not to allow state commissions to set rate-center based utilization thresholds.<sup>23</sup> The Commission should continue to follow a national approach to numbering resource optimization. Granting state commissions authority to establish utilization requirements within their jurisdictions is a recipe for disaster. Carriers would run the risk of having to comply with 51 different utilization thresholds. Many of the Operations Support System (“OSS”) systems that Commercial Mobile Radio Service (“CMRS”) carriers have in place are interstate in scope, and it would be both extremely time-consuming and costly to modify these systems to satisfy state-by-state reporting requirements. The *NRO Order* proves that a national, uniform approach is the most effective and efficient approach. There is no reason to move away from that paradigm in this instance.

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<sup>23</sup> See *FNPRM*, ¶ 248

**C. The Commission Should Not Apply Utilization Thresholds At The NPA-Level.**

BellSouth believes that the Commission should not apply utilization thresholds at the NPA level.<sup>24</sup> In adopting rate-center based utilization, the Commission correctly acknowledged the practical difficulties associated with NPA-based utilization. The Commission appropriately concluded that rate-center based utilization was the best approach “because it more accurately reflects how numbering resources are assigned.”<sup>25</sup> The Commission further found that rate-center based utilization data is useful because it provides state commissions with additional information on which to evaluate rate center consolidation.<sup>26</sup> The Commission explained as follows:

For example, some NPAs contain both suburban/rural and urban areas. In such “mixed” NPAs, carriers might have high utilization rates in rate centers located in densely populated areas of the NPA, and lower utilization rates in the more rural or suburban rate centers in the NPA. As a consequence, a carrier may be unable to meet an NPA-wide utilization rate, even when it is running into numbering shortages in particular rate centers in more densely-populated areas.<sup>27</sup>

NPA-based utilization does not correlate to rate-center based utilization and thus would be extremely misleading data on which to base numbering resource allocations. Because of the problems extensively detailed in the *NRO Order*, the Commission should not require NPA-based utilization.

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In sum, BellSouth believes that the enhanced enforcement authority granted to the NANPA, the semi-annual forecasting and utilization reporting requirement, and the

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<sup>24</sup> See *FNPRM*, ¶ 248

<sup>25</sup> *NRO Order*, ¶105.

<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

Month-To-Exhaust procedures set forth in the Central Office Code (NXX) Assignment Guidelines significantly reduce the need for a utilization threshold. Nonetheless, if the Commission adopts a nationwide utilization threshold at this time, BellSouth urges the Commission to: (1) set the initial threshold at fifty percent with five percent annual increases up to a maximum of 70 percent; (2) prescribe a single national utilization threshold based on rate centers rather than permitting states to adopt their own thresholds; and (3) ensure that non-pooling carriers with low utilization are not precluded from obtaining growth codes when there is a demonstrable and legitimate need.

**IV. THE COMMISSION SHOULD ALLOW A TRANSITION PERIOD OF TWELVE MONTHS AFTER IMPLEMENTATION OF WIRELESS NUMBER PORTABILITY BEFORE REQUIRING CMRS CARRIERS TO COMMENCE POOLING.**

The Commission seeks comment on whether to require covered CMRS carriers to participate in pooling immediately upon expiration of the local number portability (“LNP”) forbearance period on November 24, 2002, or to grant a transition period.<sup>28</sup> BellSouth strongly supports granting CMRS carriers a transition period.

Implementing LNP is a tremendous effort that must be accomplished without degrading service quality. The Commission recognized this fact when it granted CMRS carriers an extension to comply with the number portability requirements.<sup>29</sup> By granting forbearance, the Commission recognized that allowing the CMRS industry additional time to overcome the technical challenges associated with providing wireless LNP would

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<sup>28</sup> *FNPRM*, ¶ 249.

<sup>29</sup> *See Cellular Telecommunications Industry Association's Petition for Forbearance From Commercial Mobile Radio Services Number Portability Obligations*, WT Docket No. 98-229; *Telephone Number Portability*, CC Docket No. 95-116, *Memorandum*



serve the public interest.<sup>30</sup> Specifically, the Commission found that extending the deadline would give “CMRS carriers greater flexibility . . . to complete network buildout, technical upgrades, and other improvements . . . .”<sup>31</sup>

One aspect of number portability that is unique to wireless implementation is the requirement to support roaming on a nationwide basis. The CMRS industry, through the North American Numbering Council (“NANC”) Wireless Number Portability Subcommittee, has expressed some concern regarding the technical implications of providing nationwide roaming. In order to simultaneously support nationwide roaming and satisfy the Commission’s performance criteria for number portability,<sup>32</sup> Mobile Identification Number (“MIN”)-based carriers outside the top 100 MSAs will have to separate the Mobile Station Identifier (“MSID”) or MIN from the Mobile Directory Number (“MDN”) or telephone number to accommodate proper routing and billing of roaming calls. This process is a complex technical undertaking. The Commission therefore should give CMRS carriers time to gain experience with porting, supporting roaming in an LNP environment, trouble administration, and problem resolution before they must meet additional obligations related to number pooling.

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*Opinion and Order*, 14 FCC Rcd 3092 (1999) (“*CMRS Number Portability Forbearance Order*”).

<sup>30</sup> *CMRS Number Portability Forbearance Order* at 3104, ¶ 25.

<sup>31</sup> *Id.*

<sup>32</sup> In the *Telephone Number Portability* proceeding, the Commission adopted several performance criteria for the implementation of long-term number portability. Included among these criteria were the requirements that any long-term number portability method: (1) support existing network services, features, and capabilities; and (2) not result in any degradation in service quality or network reliability when customers switch carriers. *Telephone Number Portability*, CC Docket No. 95-116, *First Report and Order and Further Notice of Proposed Rulemaking*, 11 FCC Rcd 8352, 8378, ¶ 48 (1996).

Granting a transition period after the implementation of wireless LNP will also help ensure continued progress on several regulatory compliance fronts (*e.g.*, E911, LNP, CALEA (“Communications Assistance for Law Enforcement Act”)). The Commission should not risk jeopardizing the progress being made on these efforts by pulling resources away to work on pooling. Pooling, though dependent upon the infrastructure used to support LNP, requires separate implementation efforts. Therefore, it is imperative that LNP is functioning properly before CMRS carriers implement pooling.

Clearly, network integrity must be a top priority. In the *NRO Order*, the Commission acknowledged the importance of not placing a strain on carriers or their networks when it adopted a phased schedule for the national rollout of pooling. The Commission properly concluded that carriers must be allowed “sufficient time to undertake necessary steps to accommodate thousands-block number pooling, such as modifying databases and upgrading switch software.”<sup>33</sup> The preliminary work does not end, however, with network modifications and software upgrades. There are many additional steps required before pooling can be fully implemented (*e.g.*, forecasting, block donation, testing).<sup>34</sup>

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<sup>33</sup> *NRO Order*, ¶ 170.

<sup>34</sup> Sections 8.1 and 8.2 of the Industry Numbering Committee (INC)'s Thousand Block (NXX-X) Pooling Administration Guidelines (dated April 14, 2000) identify milestones and associated activities that must be accomplished for number pooling implementation. These milestones are: (a) Forecast Report Date – the deadline for service providers to report their forecasted thousands-block demand; (b) Block Protection Date – the deadline for service providers to “protect” specified thousands blocks (those with up to 10 percent contamination) from further contamination; (c) Block Donation Identification Date – the deadline for service providers to report their surplus/deficiency of thousands blocks to the pooling administrator; (d) Pooling Administrator Assessment of Industry Inventory Pool Surplus/Deficiency – the deadline for the pooling administrator to aggregate and evaluate service provider thousands-block donation information and determine, on a rate area basis, whether there is a surplus of thousands blocks or whether an additional NXX

For all of these reasons, BellSouth proposes a transition period of twelve months after the implementation of wireless LNP before CMRS carriers commence pooling.

Wireline carriers have benefited from a transition period – though not federally mandated. CMRS carriers should have the same opportunity to ensure network reliability, maintain service integrity, and implement OSS and number administration modifications necessary to support thousands-block number pooling.

**V. THE COMMISSION SHOULD NOT REQUIRE CARRIERS TO PAY FOR TELEPHONE NUMBERS.**

The *FNPRM* seeks comment regarding how the Commission could implement a market-based allocation system for numbering resources and how such a system would affect the efficiency of number allocation.<sup>35</sup> The existing record convincingly demonstrates the legal, policy, and administrative challenges associated with requiring carriers to pay for numbering resources. Nearly all of the parties commenting on this issue opposed paying for numbers.<sup>36</sup> Nonetheless, the Commission is seeking additional

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code(s) is required to establish the nine-month inventory; (e) Block Donation Date – the deadline for service providers to donate their thousands blocks; (f) Pool Start/Allocation Date – the date the pooling administrator may start allocating thousand blocks from the industry inventory pool to service providers; this is also the start date for service providers to send requests for thousand blocks to the pooling administrator. See INC Guidelines (Section 8.2) for further detail.

<sup>35</sup> *FNPRM*, ¶ 251.

<sup>36</sup> See, e.g., Comments of the Ad Hoc Telecommunications Users Committee, CC Docket No. 99-200, at 20-21 (filed July 30, 1999); Comments of AirTouch Communications, Inc., CC Docket No. 99-200, at 24-26 (filed July 30, 1999); Comments of Ameritech, CC Docket No. 99-200, at 53-54 (filed July 30, 1999); Comments of AT&T Corp., CC Docket No. 99-200, at 61-63 (filed July 30, 1999); Comments of Cox Communications, Inc., CC Docket No. 99-200, at 21-23 (filed July 30, 1999); Comments of MediaOne Group, Inc., CC Docket No. 99-200, at 30-31 (filed July 30, 1999); Comments of MCI WorldCom, CC Docket No. 99-200, at 48-50 (filed July 30, 1999); Comments of Omnipoint Communications, Inc., CC Docket No. 99-200, at 31-33 (filed July 30, 1999).

comment on this issue. BellSouth opposes charging for telephone numbers for the reasons detailed below.

*Legal Basis.* As a threshold matter, BellSouth does not believe that the Commission possesses the legal authority to require carriers to pay for telephone numbers. Congress has not granted the Commission the power to charge for numbers – either explicitly or implicitly. Neither the Communications Act of 1934 nor the Telecommunications Act of 1996 (“1996 Act”) grants any express authority to impose such a payment mechanism.

The suggestion that Section 251(e)(2) of the 1996 Act may be a source of authority also fails. Section 251(e)(2) provides that “[t]he costs of establishing telecommunications numbering administration arrangements and number portability shall be borne by all telecommunications carriers on a competitively neutral basis . . . .”<sup>37</sup> The Commission’s authority under this provision does not include the power to impose fees above and beyond what is necessary to recover the costs of number administration and number portability. Today, carriers already pay for a variety of services and functions associated with numbering resources. For example, telecommunications carriers must pay for number administration, number portability, area code relief measures, and now number pooling. These are all legitimate costs that result from a service, a process, or increased functionality associated with numbers. Payment for numbers, however, does not fall into any of these categories. Consequently, imposing a fee for numbers would essentially be imposing a tax on carriers, and only Congress has the authority to impose a tax.

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<sup>37</sup> 47 U.S.C. § 251(e)(2).

*Policy Basis.* Even if the Commission possesses the legal authority to charge for telephone numbers, such an approach would not serve the public interest. As numerous commenters previously pointed out and the Commission has recognized, numbers are a “public resource” that should be free to all users based on need.<sup>38</sup> In order to obtain the Commission’s policy goal of efficient use of numbers, the “price” for numbers would have to be high enough to dissuade carriers from paying for numbers they may not need. A high price for numbers therefore would place new entrants and smaller carriers at a competitive disadvantage.

The Commission rejected a similar proposal to charge for the use of telephone numbers when it sought to determine the best way to recover the costs of number administration.<sup>39</sup> In rejecting that proposal, the Commission found that “per-number charges would be inequitable, as they may fall disproportionately on the fastest growing users of numbers such as wireless service providers.”<sup>40</sup> This type of inequity remains a possible risk under the Commission’s most recent proposal to charge for numbers. Instead of numbers being allocated based on need, numbers would be assigned based on a carrier’s ability to pay. Such a system would not prevent carriers with deep pockets from hoarding numbers. In addition, the cost would inevitably be passed on to consumers. Thus, consumers would incur higher costs for services and would be disadvantaged because those carriers unable to pay for numbers would be excluded from the market, thereby diminishing competition and consumer choice.

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<sup>38</sup> *Administration of the North American Numbering Plan*, CC Docket No. 92-237, *Report and Order*, 11 FCC Rcd 2588, 2591, ¶ 4 (1995) (“*NANP Order*”).

<sup>39</sup> *See NANP Order* at 2629, ¶ 100.

<sup>40</sup> *Id.*

BellSouth believes that the root cause of the current numbering situation is not the absence of a market-based system for allocating numbers, but rather the inherent infirmities in the existing system that, to some extent, have been addressed by the *NRO Order*. The two major factors contributing to numbering resource exhaust are (1) the allocation of numbers in blocks of 10,000, regardless of a carrier's need for numbers; and (2) the initial footprint requirement of a full NXX on a per-rate center basis. The numbering situation cannot be resolved until these factors are addressed.

The *NRO Order* takes the initial steps to address the first contributor to number exhaust – allocation of numbers in blocks of 10,000. In its *NRO Order*, the Commission established “a single system for allocating numbers in blocks of 1,000, rather than 10,000, wherever possible . . . and establish[ed] a plan for national rollout of thousands-block number pooling.”<sup>41</sup> This fundamental change in the allocation of numbers, combined with national pooling efforts, will help minimize the inefficiencies in the existing system.

States need to address the second cause of number exhaust by examining revenue-neutral rate center consolidation. Reducing the number of rate centers will reduce the number of NXX codes that have to be assigned. Rate center consolidation may not make sense everywhere, but, as the Commission concluded, it is one of the many conservation measures that “will assist in further optimizing our numbering resources.”<sup>42</sup> BellSouth therefore encourages state commissions to study the issue of rate center consolidation to

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<sup>41</sup> *NRO Order*, ¶ 5.

<sup>42</sup> *Id.*, ¶ 128.

determine whether it can be used successfully in combination with other conservation measures.<sup>43</sup>

*Administrative Basis.* Finally, implementation of a market-based allocation system for numbers would be administratively burdensome. The *FNPRM* seeks comment on how the Commission could implement a market-based allocation system, but does not propose a specific framework. Therefore, it is difficult to provide meaningful comment in the absence of specifics.

Nonetheless, as a general matter, BellSouth, like most commenters, is opposed to any system requiring carriers to pay for the use of numbers. Such a system gives rise to a host of questions that the Commission would need to address:

- If carriers were to pay for numbers, for what and to whom would they actually make payment?
- Does payment imply ownership of the number or would a carrier simply pay to “lease” the number?
- Would the Commission’s payment scheme apply to all numbering resources, including carrier identification codes (“CICs”) and vertical service codes?
- How would the price be established?
- Would “verification of need” still be required?
- How would ported numbers be treated in a market-based approach?
- Would discounts be given to carriers that use numbers efficiently and how would this efficiency be measured?
- How would the Commission treat the embedded base of numbers?

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<sup>43</sup> Rate center consolidation will affect local calling and carrier revenues. Therefore, state commissions can order rate center consolidation only when it can be accomplished on a revenue-neutral basis and carriers are permitted to recover the costs of implementation.

It is unnecessary to consider a payment mechanism for numbers. The Commission has just established a new number optimization framework that completely transforms the traditional system of allocating numbers. The Commission should allow the various administrative and technical conservation measures time to work. The FCC, state commissions, the NANPA, and carriers should focus their energies and resources on implementing the various requirements adopted in the *NRO Order* rather than devising and evaluating a pricing mechanism.

**VI. THE COMMISSION CAN AND SHOULD PROCEED WITH ESTABLISHING A NATIONAL COST RECOVERY MECHANISM IN THE ABSENCE OF DETAILED COST INFORMATION.**

In its *NRO Order*, the Commission declined to adopt a national cost recovery mechanism “because the record does not contain adequate information regarding the range and magnitude of incremental costs that carriers will incur to implement thousands-block number pooling.”<sup>44</sup> Therefore, the Commission has asked parties to provide further comment and cost studies that quantify the shared industry and direct carrier-specific costs of number pooling.<sup>45</sup> The Commission also seeks “comment and cost studies that take into account the cost savings associated with thousands-block pooling in comparison to the current numbering practices that result in more frequent area code changes.”<sup>46</sup>

BellSouth is in the process of quantifying the costs associated with providing number pooling. We are not prepared, however, to provide a detailed cost study at this time, but will provide more information to the Commission once it is available.

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<sup>44</sup> *NRO Order*, ¶ 194.

<sup>45</sup> *FNPRM*, ¶ 253; *NRO Order*, ¶ 214.

<sup>46</sup> *Id.*



The lack of cost information, however, should not preclude the Commission from establishing a federal cost recovery mechanism. BellSouth disagrees with the Commission's conclusion that it cannot determine a cost recovery mechanism in the absence of detailed cost data.<sup>47</sup> The Commission established a cost recovery scheme for number portability prior to having detailed cost information. In the number portability proceeding, carriers did not submit cost studies until after the Commission had already adopted a cost recovery mechanism. There is no reason why the Commission cannot take the same approach here. BellSouth therefore urges the Commission to move quickly to develop a national cost recovery framework even in the absence of extensive cost data.

BellSouth believes that the cost recovery mechanism established in the number portability proceeding is an appropriate framework for recovering the costs associated with the implementation of pooling. As the Commission appropriately concluded, "the costs of thousands-block number pooling: (a) should not give one provider an appreciable, incremental cost advantage over another when competing for a specific subscriber; and (b) should not have a disparate effect on competing providers' abilities to earn a normal return."<sup>48</sup> To satisfy the above-criteria, BellSouth suggests that the Commission adopt the same cost recovery mechanism that it adopted in the number portability proceeding. Specifically, the Commission should allow, but not require, incumbent LECs subject to rate-of-return or price-cap regulation to recover their carrier-specific costs directly related to providing number pooling through an optional federal

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<sup>47</sup> See *NRO Order*, ¶ 214; *FNPRM*, ¶ 253.

<sup>48</sup> *NRO Order*, ¶ 199.

charge assessed on end-users.<sup>49</sup> Those carriers not subject to rate regulation (*e.g.*, competitive LECs, CMRS providers, and non-dominant IXC) should be permitted to recover their carrier-specific costs directly related to providing number pooling “in any lawful manner consistent with their obligations under the Communications Act.”<sup>50</sup>

Finally, BellSouth questions the need for “comment and cost studies that take into account the cost savings associated with thousands-block pooling in comparison to the current numbering practices that result in more frequent area code changes.”<sup>51</sup> Any cost savings associated with number pooling would be purely speculative at this point because carriers have yet to identify fully all of the costs associated with pooling. BellSouth cautions the Commission against using a cost savings formula that compares speculative pooling savings with the actual costs of area code relief. The results of such a formula could be misleading. Moreover, it is unclear what value can be derived from this exercise. Although number pooling may extend the life of specific NPAs, it does not eliminate the need for NPA relief. Thus, on an NPA-by-NPA basis, the only cost savings from number pooling will be the time value of money associated with the deferral of NPA relief.

**VII. THE NETWORK MODIFICATIONS, OSS MODIFICATIONS, AND COSTS ASSOCIATED WITH IMPLEMENTING NUMBER POOLING ARE SUBSTANTIAL, AND ANY COST RECOVERY MECHANISM ADOPTED MUST PROVIDE FULL COST RECOVERY.**

In the absence of a detailed cost study, BellSouth identifies below the various

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<sup>49</sup> See *Telephone Number Portability*, CC Docket No. 95-116, *Third Report and Order*, 13 FCC Rcd 11701, 11773, ¶ 135 (1998).

<sup>50</sup> *Id.* at 11774, ¶ 136.

<sup>51</sup> *FNPRM*, ¶ 253.

types of costs it is likely to incur to implement pooling. This assessment, however, is preliminary, and it is likely that BellSouth will incur additional or different costs from the ones included herein. Nevertheless, we believe that the Commission will find the information helpful. It is important to note that the costs described in the section below do not include the costs that BellSouth's wireless unit will incur to implement pooling. Nonetheless, the costs that will be incurred by CMRS carriers are legitimate, and the Commission should allow CMRS carriers to recover their costs as well.

**A. Cost Categories For Thousands-Block Number Pooling ("TNP")**

The *NRO Order* adopted three categories of costs for thousands-block number pooling: (1) shared industry costs (or "Type 1" costs);<sup>52</sup> (2) carrier-specific costs directly related to thousands-block number pooling implementation (or "Type 2" costs);<sup>53</sup> and (3) carrier-specific costs not directly related to thousands-block number pooling administration (or "Type 3" costs).<sup>54</sup> The Commission further concluded that shared industry costs (Type 1 costs) and carrier-specific costs directly related to pooling (Type 2 costs) would be subject to cost recovery.<sup>55</sup>

BellSouth supports the Commission's adoption of these categories and identifies below the categories of Type 1 and Type 2 costs it intends to recover. BellSouth intends to include these costs in its cost study.

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<sup>52</sup> The Commission defines shared industry costs as those costs incurred by the industry as a whole (including NANP administrator costs, and enhancements to the number portability regional database). *NRO Order*, ¶¶ 201, 203.

<sup>53</sup> Carrier-specific costs directly related to thousands-block number pooling are those costs associated with enhancements to various carriers systems (*e.g.*, enhancements to service control points, local service management systems ("LSMS"), service order administration ("SOA"), and operations support systems). *NRO Order*, ¶¶ 201, 203.

<sup>54</sup> *NRO Order*, ¶¶ 201, 203.

<sup>55</sup> *Id.*, ¶ 207.

## **1. Shared Industry Costs**

As stated above, shared costs are the costs incurred by the industry to build, operate, and maintain the databases needed to provide number pooling. A third party administrator – the Number Pooling Administrator – will construct and maintain these databases. The *NRO Order* requires each telecommunications carrier to pay its allocated share of the costs associated with pooling administration.<sup>56</sup> A carrier's allocated share of these Type 1 costs will be based on that carrier's total intrastate, interstate, and international telecommunications end-user revenue.<sup>57</sup> Once a carrier's share of the Type 1 costs is defined and allocated, that share will become a carrier-specific cost directly related to the provision of thousands-block pooling, *i.e.*, a Type 2 cost.<sup>58</sup> Accordingly, BellSouth plans to include all shared costs allocated to it in its cost study.

### **a. Number Portability Administration Center ("NPAC") Upgrade And Ongoing Costs**

The NPAC Service Management System database contains all necessary routing information on ported numbers and facilitates the updating of the routing databases of all subtending service providers in the portability area. The Southeast Region NPAC, which serves BellSouth, will be updated with Release 3.0 software functionality. The North American Portability Management Limited Liability Committee and NeuStar, administrator of the Southeast Region NPAC, are currently negotiating the terms and conditions of an agreement.

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<sup>56</sup> *NRO Order*, ¶ 207.

<sup>57</sup> *Id.*

<sup>58</sup> *Id.*, ¶ 204.

**b. National Pooling Administrator**

The national pooling administrator will have the following high-level responsibilities to support participating service providers: (1) general administrative duties; (2) forecasting and planning; (3) number assignment; and (3) block reclamation. The national pooling administrator will be funded through the North American Numbering Plan Billing and Collection Agent ("NBANC") agreement. BellSouth's contribution to the NBANC is a fully recoverable shared cost and will be included in its cost study.

**2. Carrier-Specific Costs Directly Related To Providing Thousands-Block Number Pooling**

Carrier-specific costs directly related to thousands-block number pooling are those "costs associated with updates to carriers' networks (including LSMS, SCP, SOA, and OSS systems), as well as, each carrier's allocated portion of shared industry costs," as discussed above.<sup>59</sup> In its *NRO Order*, the Commission concluded that allowing carriers to recover their own carrier-specific (Type 2) costs is consistent with the competitive neutrality requirements in Section 251(e)(2).<sup>60</sup> The Commission also adopted the same "but for" test used in the number portability proceeding in order to identify carrier-specific costs directly related to thousands-block number pooling. Under this "but for" test, costs are eligible for recovery only if they satisfy the following two requirements: (1) the costs would not have been incurred by the carrier "but for" the

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<sup>59</sup> *NRO Order*, ¶ 208.

<sup>60</sup> *Id.*, ¶ 209.

implementation of thousands-block number pooling; and (2) the costs were incurred “for the provision of” thousands-block number pooling.<sup>61</sup>

BellSouth is incurring – and will continue to incur – significant costs to provide thousands-block number pooling (“TNP”). The subsection below describes the carrier-specific costs directly incurred by BellSouth in the provision of TNP. BellSouth submits that each of the identified costs satisfies the “but for” test and is therefore eligible for full cost recovery. We categorize these costs as: (a) network costs; (b) OSS and service management system (“SMS”) costs; and (c) employee-related and other costs.

**a. Network Costs**

**(1) Network Software Costs Dedicated Exclusively To Providing Thousands-Block Number Pooling**

***i. TNP Service Package Application (“SPA”) Enhancement***

BellSouth is developing additional call processing and routing logic required for thousands-block pooling. The Service Package Application (“SPA”) is software installed on BellSouth’s Service Control Points (“SCPs”) to provide routing instructions to the central office switch. The logic required for thousands-block number pooling is distinct from, and not included in, the existing porting and default routing logic. The call processing hierarchy requires the following determination: first, whether a number is ported; second, if that number is ported, whether the number is also pooled; and, third, if the number is neither ported nor pooled, whether to default route the call. BellSouth

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<sup>61</sup> *NRO Order*, ¶¶ 217-218.

considers the costs associated with this modification to be fully recoverable as “dedicated” costs.<sup>62</sup>

**ii. Switch Feature Software Upgrades - 5ESS, DMS 100, And EWSD**

Providing TNP requires BellSouth to perform feature upgrades to certain switches. This TNP feature software is used solely for the purpose of providing TNP. Therefore the costs of such upgrades are fully recoverable as carrier-specific costs directly related to the provision of number pooling. Number pooling switch requirements include the need to denote an unallocated directory number or a range of directory numbers so that calls routed to these numbers will not receive error treatment.

**(2) Network Hardware And Software Joint Costs Directly Related To Providing Thousands-Block Number Pooling**

BellSouth will incur both hardware and software costs that are only partially related to the provision of TNP (*i.e.*, joint costs). The *NRO Order* defines joint costs as “incremental costs associated with new investments or expenses that directly support thousands-block number pooling and also support one or more non-number pooling functions.”<sup>63</sup> The following describes the circumstances under which BellSouth will incur joint costs and, in some instances, identifies the method BellSouth proposes to use to allocate the appropriate amount of costs to TNP. If no allocation method is identified, BellSouth will provide such information in its forthcoming cost study.

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<sup>62</sup> The *NRO Order* classifies carrier-specific costs directly related to number pooling into three basic categories: (1) dedicated number pooling costs; (2) joint number pooling costs; and (3) incremental overheads. *NRO Order*, ¶ 219.

<sup>63</sup> *NRO Order*, ¶ 221.

***i. Service Control Point Hardware And Software – Processor And Memory Upgrades***

BellSouth will upgrade its SCPs specifically for the purpose of providing TNP. These SCPs house the database that contains routing information for ported and now pooled numbers. A SCP receives the called number in a query from a Service Switching Point (“SSP”) and responds with routing instructions that enable the SSP to complete the call. The query and the resulting routing instructions travel over the Common Channel Signaling Network (“CCSN” or “SS7” Network). Random Access Memory (“RAM”) upgrades will be required on some SCPs. SCPs will be upgraded with Model 2+ processors to provide sufficient Central Processor Unit (“CPU”) capacity to serve pooling query demand as a result of the increased cycle time required to process TNP queries. The costs associated with these hardware and software modifications are fully recoverable joint costs. BellSouth will determine the allocation method in its forthcoming cost study.

***ii. Switch Hardware – Processor Upgrades***

Thousands-block number pooling will require BellSouth to increase the overall call-processing capacity of some switches due to the query/response traffic associated with the database lookups to obtain call routing information for calls to pooled or ported numbers. BellSouth is in the process of assessing the processor capacity of each individual central office. BellSouth proposes to allocate a portion of these joint costs to TNP based on the percentage of processor utilization attributable to BellSouth’s TNP query/response traffic. Since BellSouth must advance the timing of these upgrades to accommodate the provision of TNP, it will treat the cost of money incurred to advance



the upgrades as a fully recoverable cost. No other portion of these upgrade costs will be allocated to TNP.

***iii. Switch Generic Software Upgrades – 5ESS, DMS 100, And EWSD***

BellSouth routinely upgrades base operating system software for its 5ESS, DMS-100, and EWSD type switches. However, the upgrades will be advanced in order to provide TNP. Accordingly, the cost of money incurred to advance these upgrades will be treated as a fully recoverable cost. No other portion of the upgrade costs will be allocated to TNP.

***iv. Hardware And Software For BellSouth NPAC Interface System***

The BellSouth Number Portability Administration Center (“NPAC”) Interface System serves as the interface between NPAC, the internal-BellSouth OSS systems, and the CLEC interface systems that currently support LNP and will shortly support TNP. LNP and TNP require interaction and coordination among CLECs, the NPAC, and internal OSS systems. BellSouth uses a number of systems to both automate and provide interfaces for BellSouth service representatives to coordinate activities among the various systems. The TNP enhancements will support NPAC and Pooling Administrator processes that allocate NPA-NXXs at the thousands-block level within rate centers.

These enhancements would not have been incurred but for the implementation of number pooling and therefore will be carrier-specific costs directly related to number pooling. At this time, BellSouth proposes to allocate a portion of the costs associated

with updating hardware (*e.g.*, database server) and modifications to software as fully recoverable joint costs.<sup>64</sup>

**b. OSS And Service Management System (“SMS”) Hardware And Software Costs**

*Operations Support Systems (“OSS”) Costs.* A significant portion of the costs that BellSouth will incur to implement TNP will be associated with modifications to its OSS systems. The implementation of pooling requires the modification of every system that handles telephone numbers – which is a substantial number of systems. The provision of LNP involved significant and fundamental network changes for call-routing and call processing. The implementation of TNP is just as significant. TNP requires fundamental changes to essentially every system that currently relies on the NXX portion of the 10-digit NANPA telephone number as a primary data source.

Attachment A provides a brief summary of all of the BellSouth OSS systems impacted by TNP. This list identifies the OSS systems by functionality (*e.g.*, pre-ordering, ordering, provisioning, billing) and describes the system changes necessary to accommodate TNP.

*Service Management System (“SMS”) Costs.* BellSouth must adapt its Advanced Intelligent Network SMS (“AIN-SMS”) to manage the SCPs and their databases. The AIN-SMS receives ported and/or pooled number information broadcast from the NPAC (via the BellSouth Gateway), processes that information, and downloads it to the appropriate SCP. Upgrades to the AIN-SMS will be required primarily to (a) support a

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<sup>64</sup> A preliminary assessment indicates that these costs are actually a combination of both dedicated and joint costs. Although BellSouth has included these costs solely in the joint-cost section for purposes of this pleading, our final cost study will likely apportion these costs between dedicated and joint costs.

new port type called “Pool” and (b) modify database schema and associated logic to support the Efficient Data Representation.<sup>65</sup> These upgrades provide the fundamental capability to distinguish a pool query and provide the database efficiency of representing a thousands-block as a single record and are directly attributable to number pooling. Accordingly, BellSouth proposes to allocate a portion of these joint costs to TNP.<sup>66</sup>

**c. Employee-Related and Other Costs**

As described more fully below, BellSouth has employees dedicated to working on projects for the implementation of TNP. The labor costs associated with these TNP projects are fully recoverable as Type 2 costs.

**(1) Translations**

BellSouth incurs labor costs to perform translations<sup>67</sup> to provision TNP-feature software and to apply directory number markings (*i.e.*, reserved or ported-out). These translations are needed to specify the directory numbers for which the switches will launch queries to the TNP databases.

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<sup>65</sup> Efficient Data Representation (“EDR”) allows the storage of large blocks of numbers as a single record. This capability is included in NPAC Release 3.0 and is deemed essential for the long-term implementation of thousands-block number pooling because it significantly increases the storage capacity in network elements such as the service control points.

<sup>66</sup> A preliminary assessment indicates that these costs are actually a combination of both dedicated and joint costs. Although BellSouth has included these costs solely in the joint-cost section for purposes of this pleading, our final cost study will likely apportion these costs between dedicated and joint costs.

<sup>67</sup> A translation is a process in which an employee prepares tables to identify the proper routing for a switch.

## **(2) Network Infrastructure**

BellSouth has employees dedicated to network infrastructure planning and implementation. These employees are responsible for ensuring that all aspects of TNP, including network hardware and software upgrades, are properly designed and implemented.

## **(3) Science & Technology**

BellSouth has within its Science & Technology organization employees dedicated to working on the implementation of TNP. These employees: (1) write software requirements for the various BellSouth systems; (2) test vendor software for TNP; (3) test software written internally; and (4) support field groups if problems are encountered during TNP implementation.

## **(4) Project And Administrative Management**

BellSouth has employees dedicated to performing specific job functions associated with TNP, including project management, business planning, and field support. BellSouth also employs independent contractors to support the implementation of TNP.

## **(5) Training**

Training will be provided to all center employees (*e.g.*, residence and business repair centers) impacted by thousands-block number pooling. This training will be developed and delivered by BellSouth employees or outside contractors. Training will be based on the needs of each specific center.

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As demonstrated above, the implementation of thousands-block number pooling is a massive undertaking that generates substantial costs. BellSouth has identified a preliminary list of the costs it will incur to provide TNP. Those costs are directly attributable to the provision of number pooling and satisfy the “but for” test; consequently, BellSouth will treat such costs as fully recoverable pursuant to the *NRO Order*. In some instances, functionalities developed or software upgrades made to provide TNP will also support other services. In those instances, BellSouth plans to allocate only a portion of the costs to TNP for cost recovery purposes.

## **VII. CONCLUSION**

For all of the forgoing reasons, BellSouth urges the Commission to take the following actions:

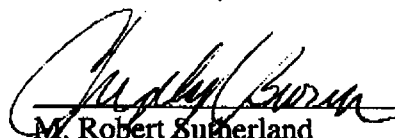
- (1) If the Commission proceeds with the adoption of a utilization threshold, it should:
  - (a) set the initial threshold at 50 percent with five percent annual increases up to a maximum of 70 percent;
  - (b) prescribe a single national utilization threshold based on rate centers rather than permitting states to adopt their own thresholds; and
  - (c) ensure that non-pooling carriers with low utilization can still obtain growth codes if a legitimate business need exists.
- (2) The Commission should grant CMRS carriers a transition period of twelve months after the implementation of wireless LNP to begin pooling.
- (3) The Commission should not require carriers to pay for numbering resources.
- (4) The Commission can and should proceed with the adoption of a national cost recovery mechanism in the absence of detailed cost information; and

- (5) The Commission should recognize that the network modifications, OSS modifications, and costs associated with implementing number pooling are substantial and allow carriers to recover these costs.

Respectfully submitted,

**BELLSOUTH CORPORATION**

By its Attorneys

  
\_\_\_\_\_  
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Date: May 19, 2000

# **ATTACHMENT A**

## **SYSTEM REQUIREMENTS FOR NUMBER POOLING**

### **Pre-Ordering**

#### **Systems Impacted – BONIS, COFFI, PSIMS**

- These systems must have the capability to recognize NPA-NXX-X. Specifically, these systems must have the capability to recognize:
  - (1) Numbers/ranges that are pooled and not available to BellSouth for assignment;
  - (2) Numbers/ranges that have been donated to a CLEC;
  - (3) Numbers/ranges that were previously CLEC numbers but are now available in BellSouth for assignment; and
  - (4) Numbers/ranges that were previously BellSouth numbers but have been donated to another BellSouth switch.

### **Ordering**

#### **Systems Impacted – ACCESS, CSPS, LESOG, RIGHTTOUCH, RNS, ROS, SOCS, SONGS, DBAS II, DOE/DSAP, LIDB, CARE, MISOP, BCOS, VNS, MECHSO, LIST**

- These systems must have the capability to recognize NPA-NXX-X.
- These systems must have the ability to populate required fields on all inward action orders for downstream processing:
  - (1) Serving Exchange Key (“EXK”) (used to correctly route calls to the correct switch) NXX no longer determines routing since number ranges can be spread across multiple switches in a toll message rate center. Previously, only port-in activities had EXK;
  - (2) Serving Toll Traffic Rate Area (used to correctly bill calls) can be different than serving Exchange Key; and
  - (3) Location Routing Number (“LRN”) is also being added to the service order. Since we are in that service order code, the LRN provides the necessary information to route and perform trouble resolution for maintenance and repair.
- These systems must have the capability to process intra-company ports (currently port in activity is allowed only against a CLEC numbers).

### **Provisioning**

#### **Systems Impacted – ATLAS, ARTS, HAL, LEACS, LEIS, MARCH, NSDB, OM, PAWS, SOAC, SWITCH, WFA/C, BAC, DBRT, LAUTO, LION, RSAG, CNUM, ISP, LNP Gateway**

- These systems must have the capability to recognize and process exchange keys and location routing numbers on all inward action orders.

## **ATTACHMENT A**

- These systems must have the capability to recognize and process intra-company ports.

### **Billing**

#### **Systems Impacted – CABS, CRIS, MATV, BAMS, BOCABS**

- These systems must have the capability to recognize, store, and bill on Toll Traffic Rate Area (“TTRA”) passed on the service order. Currently TTRA equates to an NPA-NXX which is no longer specific enough for billing purposes.
- These systems must have the capability to recognize and bill properly on numbers that have been intra-company ported.
- These systems may also be required to store the LRN and EXK values passed on the service order.

### **Maintenance and Repair**

#### **Systems Impacted – LMOS FE, LMOS HOST, SNECS, TAFI, LNP TAG, TAP, PREDICTOR**

- These systems must have the capability to recognize and properly route trouble/trucks based on NPA-NXX-X.

### **E911**

#### **Systems Impacted – 911 GW, 911 DB**

- Software changes are required to process intra-company porting orders (currently porting orders require port-out from old service provider with corresponding port-in from new service provider). NPA-NXX tables must be enhanced to support NPA-NXX-X.



## **CERTIFICATE OF SERVICE**

I do hereby certify that I have this 19th day of May, 2000, served the following parties to this action with a copy of the foregoing ***COMMENTS OF BELLSOUTH***, reference CC Docket No. 99-200, by hand delivery, or Federal Express, addressed to the parties as set forth below.

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Juanita H. Lee

***\*Via Hand Delivery***